| | Base-Year Problem Categories/Types | Base-Year Revision Method | Initial Recommendations | Initial Staff Comments/Criteria | Juris Qty |
|---|---|---|---|---|---|
| **A. Generic Revision Methods:** | | | | | |
| A-1 | Various | Request that 1995 disposal tonnage (from disposal reporting system), and 1995 diversion tonnage, such as from funded/operated programs (refer to B-1 of the model annual report) plus any other quantified tonnages, become the new base-year generation. | Acceptable Method (if criteria are met) | Must provide all calculations, cite all sources of data and use auditable data records. Provide a complete explanation on how the tonnages were derived. | 4 |
| A-2 | Various | Use the adjustment method backwards by taking the 1995 disposal tons, then adjust for changes in population & economics to project an estimate of the base-year tons, and add this amount to the existing base-year diversion tonnages. | Unacceptable Method | The adjustment method is correlated to waste generation, not to individual waste stream components. Combining a disposal estimate based on 1995 data with the original base-year diversion is mixing apples and oranges, as the disposal and diversion proportions of the waste stream should have changed between the base-year and reporting-year. | |
| A-3 | Various | Revise base-year to only include franchised hauler data. *Note: Computing diversion rate based solely on franchised hauler data.* | Unacceptable Method | Statute requires that all sources of waste disposal going to permitted facilities be included (refer to PRC 41781) | 1 |
| A-4 | Various | Making multiple types of revisions. | n/a | Be sure to calculate the corrections in a logical sequence and avoid double counting. Quantify each type of correction separately. Must provide all calculations and cite sources of data. Corrections to base-year and reporting-year data should not contradict one another. | Many |
| **B. Problems Related to Measuring/Calculating Tonnages:** | | | | | |
| B-1a | Franchised base-year residential tonnages do not appear to be accurate. | Since the resulting per capita rate is considered to be too low, they "guestimate" the consultant neglected to include multi-family waste tonnages in either the residential or the commercial SWGS amounts. They recalculated the residential franchised waste tonnage using a per capita rate. | Unacceptable Method | Regulations allow for comparable data to be used in characterizing the waste stream but not for determining the quantity of waste generated. Per capita averages vary dramatically, and while useful for certain planning purposes that can rely on rough averages, they are not sufficiently accurate for quantifying the waste generation tonnages for demonstrating achievement of the disposal reduction goal. Should investigate further to verify whether multi-family waste was indeed missed, and if so, attempt to quantify the 1990 tons. | 1 |

## Attachment A: List of Acceptable/Unacceptable Base-Year Revision Methods

| Base-Year Problem Categories/Types | | Base-Year Revision Method | Initial Recommendations | Initial Staff Comments/Criteria | Juris Qty |
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| B-1b | *Same as above.* | Examination of the annual residential tonnages alerted them to a problem - it appears base-year tons were only based on 6-months data. Quantified the revised base-year residential tonnage using hauler records based on actual weight tickets. | Acceptable Method (if criteria are met) | Must provide all calculations, cite all sources of data and use auditable data records. Provide a complete explanation on how the tonnages were derived. | 1 |
| B-2 | Industrial waste in SWGS were understated (a significant portion of these tonnages were omitted). | Reviewed economic activity from base-year to current, and industrial waste tonnage records for more current years. Data indicates no significant changes since the base-year. Revised the base-year industrial tonnage based on the average of the more current years data. | Acceptable Method (if criteria are met) | Need to demonstrate first that these amounts were indeed missed in the original SWGS, and then secondly, need to document the more current tons used to derive the average. Also need to demonstrate that these industrial facilities were in existence in 1990 (& that is not just a change in condition). Discuss how double-accounting has been avoided. | 1 |
| B-3 | No scales in base-year, used volume-to-weight conversion method. After scale installation, disposal tons increased or decreased noticeably. | Compare landfill tonnages for as many years before & after scale installation as available. Calculate the average annual increase/decrease and revise the base-year data accordingly. | Acceptable Method (if criteria are met) | Must provide a reasonable analysis demonstrating how the before/after data is being used to make a correction for the inaccurate conversion factor. Provide volume/tonnage data, cite sources of data, show calculations & discuss the analysis. Provide verification that there were no other changes/special situations that contributed to the increase/decrease. | 2 |
| B-4 | Diversion tonnages were understated or omitted for programs that were in existence in the base-year. | Increased base-year diversion by the estimated tons diverted by these diversion activities. | Acceptable Method (if criteria are met) | Additional diversion may be submitted at any time. The submittal must include the complete calculations (showing all of the steps) and cite the sources for all data used in the calculations (such as participation rates). Demonstrate that these portions of the waste stream were indeed missed in the SWGS and that no double accounting is occurring. The revised base-year data needs to be fully explained (by program, by waste type) and meet all other SWGS requirements. New base-year diversion is still subject to the restricted waste criteria. | 6 |
| B-5 | Diversion tonnages are believed to be understated. | Disposal tonnages of the SRRE were understated and revised based on more current data believed to be more accurate. The existing SRRE diversion rates (per sector) were applied to the higher disposal tonnages to extrapolate | Unacceptable Method | No correlation was demonstrated that increasing disposal tonnages equates to similarly increased diversion tonnages. Diversion must be quantified by program and by waste type and meet all other SWGS requirements. | 2 |

| Base-Year Problem Categories/Types | | Base-Year Revision Method | Initial Recommendations | Initial Staff Comments/Criteria | Juris Qty |
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| | | additional diversion tonnages. | | | |
| B-6a | Generation tonnages believed to be under-estimated in the SWGS. | Changing the source of data from their individual SWGS to the county-wide SWGS. | Acceptable Method (if criteria are met) | County-wide SWGS must meet regulatory requirements. | 1 |
| B-6b | *Same as above.* | Would like the 1995 disposal tons to become the new base-year, even though there are no diversion tonnages quantified, as this is the only measured data available. | Acceptable Method (if criteria are met) | Must provide all calculations, cite all sources of data and use auditable data records. Provide a complete explanation on how the tonnages were derived. | 2 |
| B6c | *Same as above.* | The base-year generation tonnage was increased without a reasonable explanation (they believe this revised total more accurately reflects the base-year situation). | Unacceptable Method | While rough averages may be useful for certain planning purposes, they are not sufficiently accurate for quantifying the waste generation tonnages for demonstrating achievement of the disposal reduction goal. A revision should provide actual, itemized revisions to the base-year data. | 2 |
| B6d | *Same as above.* | Began requiring licensed hauling firms to submit annual disposal reports in 1991. Accounting firm was employed for random audits to ensure accurate reporting by haulers. Want to replace the 1990 base-year data with 1991 data. | Acceptable Method (if criteria are met) | Must provide all calculations, cite all sources of data and use auditable data records. Provide a complete explanation on how the tonnages were derived. | 1 |
| B-7 | A specific waste generator's disposal tonnage is believed to have been understated in the SWGS (university waste, for example). | Replace the original SWGS data with more reliable information. | Acceptable Method (if criteria are met) | Provide verification of the original data and discuss the source of this data (demonstrate how this data was provided in the SWGS). Provide verification for the new data, discuss the source of this data, and provide sufficient justification as to why the new data represents more accurate data. | 1 |
| B-8 | A specific waste generator's disposal tonnage is believed to have been omitted in SWGS. | Add in omitted tons based on reliable information. | Acceptable Method (if criteria are met) | Provide verification that the waste generator was in existence in base-year and that their disposal was not included in base-year. Provide verification for the disposal data and discuss the source of this data. | 2 |
| B-9 | Unusual increase or decrease in waste disposal occurred in the base-year, based on a comparison of landfill totals over several years. | A) Replace the base-year disposal with the subsequent years disposal tonnage amount<br>B) Revise the base-year disposal by subtracting the special event waste | Acceptable Method (if criteria are met) | Must provide reasonable analysis that demonstrates the increase/decrease of the base-year by using the before/after data. Provide volume/tonnage data, cite sources of data, show calculations & discuss the analysis. | 1 |

| Base-Year Problem Categories/Types | | Base-Year Revision Method | Initial Recommendations | Initial Staff Comments/Criteria | Juris Qty |
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| | | tonnages | | Provide justification as to why the adjustment method calculations would not provide a sufficient adjustment in the goal measurement calculations to already account for this situation. | |
| **C. Problems Related to Assigning Jurisdiction of Origin:** | | | | | |
| C-1a | The allocation method used in the SWGS to apportion the regional disposal total to each jurisdiction (such as based on population ratios or equal distributions to each jurisdiction) is now believed to have been an inaccurate method. | Applied the 1995 disposal reporting system percentages to reallocate the region's base-year tonnages. | Unacceptable Method of Reallocation | Conditions may have changed significantly between the base-year & reporting-year. Reporting-year data should be used for comparative analysis only. Base-year revisions should be based on base-year statistics. Should only use a population analysis for the residential portion. For commercial/industrial sectors, examine business licenses/employment/tax sales/permits, industry profiles, etc. for a regional comparison. *Note: Forming a regional agency would allow a region to report as a single entity and would eliminate many of these types of regional allocation errors.* | 3 |
| C-1b | *Same as above.* | Conducted more recent study to determine a more accurate allocation of the base-year tonnages for the region. Revised base-year based on study results. | Acceptable Method (if criteria are met) | *Same as above.* Study must be based upon actual base-year conditions (or conditions close to the base-year) using such factors as listed above. | 10 |
| C-2 | Regionally allocated tonnages that were derived during the base-year studies for nonspecific origin waste (such as C&D) were excluded from the SWGS base-year. Most regions allocated these tonnages based on population ratios. | Add the regionally allocated tonnages (as quantified during the base-year studies) into the base-year data. | Acceptable Method (if criteria are met) | Need to be sure to subtract out any initial tonnages that were already included for any portion of this waste stream. Source data must meet all regulatory requirements. | 3 |
| C-3a | Regional analysis indicates disposal tonnages were understated for the region. | Applied a flat rate of increase to the individual jurisdiction's base-year disposal tons based on the rate of missing tonnage on a regional basis. | Unacceptable Method | A revision needs to provide actual, itemized corrections to the base-year data. This method might be technically valid at a regional level, but is not valid at the jurisdictional level. If a regional study was initially conducted, more accurate information for that region may be used to make corrections to the initial study. To apply more accurate regional data to individual jurisdiction SWGS would require extensive comparisons of the methods used in each | 12 |

# Attachment A: List of Acceptable/Unacceptable Base-Year Revision Methods

| Base-Year Problem Categories/Types | | Base-Year Revision Method | Initial Recommendations | Initial Staff Comments/Criteria | Juris Qty |
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| | | | | SWGS and the demographic similarities/differences between all of the jurisdictions in an attempt to create a regional SWGS from the individual SWGS. Revisions should be made at the jurisdictional level (*refer to category F for missing non-franchised wastes*). | |
| C-3b | *Same as above.* | Took the percentage of city to region's disposal tons and applied this rate to the tons of missing waste for the region (all tonnages based on summary plan) to find the amount of increase in the base-year generation. | Unacceptable Method | *Same as above.* | 4 |
| C-3c | *Same as above.* | Took the percentage of city to region's base-year taxable sales and applied this rate to the tons of missing waste for the (based on summary plan) to find the amount of increase in the base-year generation. | Unacceptable Method | *Same as above.* | 1 |
| C-4 | Waste was omitted in the base-year due to multiple waste origin loads being assigned to a single jurisdiction. | Conducted an in-house investigation to identify how many tons were mis-identified. | Acceptable Method (if criteria are met) | Must provide all calculations, cite all sources of data and use auditable data records. Provide a complete explanation on how the tonnages were derived. | 1 |
| **D. Problems Related to Changes in Conditions:** | | | | | |
| D-1 | Base-year tonnages includes generation of newly incorporated city. | Reduce base-year tonnages by subtracting an estimate of the new city's generation. | Acceptable Method (if criteria are met) | City & County should work cooperatively to avoid duplication of effort. | 1 |
| D-2 | Permitting status of facility changed between the base-year and reporting-year. For example, inerts landfill was not permitted in the base-year & thus tons were not included in SWGS. Now landfill is permitted and the tons are included in the reporting-year.<br>*Note: Statute requires the inclusion of solid waste disposed at permitted facilities.* | Took the 1995 tons (and may or may not have used the adjustment method backwards) to find the base-year tons. This amount was added to the base-year. | Potentially Acceptable Method<br>*Note: Staff have concerns but acknowledge that basing the revision on 1995 data may be the only reasonable solution at this time other than establishing a new base-year.* | The unadjusted data may be used as a starting point, however, Board staff have many concerns regarding the application of 1995 data to the base-year data. For example, the accuracy of these large tonnages are questionable due to the lack of verifiable records. Also, conditions may have changed significantly between the two years reducing the applicability of such a comparison. Most importantly, the accuracy of this type of revision is in question due to the variability of C&D waste tonnages which varies significantly from year to year based on construction projects, special events and disasters. Jurisdictions should examine the | 6 |

| Base-Year Problem Categories/Types | | Base-Year Revision Method | Initial Recommendations | Initial Staff Comments/Criteria | Juris Qty |
|---|---|---|---|---|---|
| | | | | 1995 and 1990 conditions and provide justification on why the 1995 disposed tons represent the 1990 disposed tons. Provide documented similarities between the two years in regards to generators of this type of waste. A comparison of another year's disposal data (such as 1996) might provide further justification for this type of revision. *Note: The adjustment method adjusts for population & economic changes only within a specific criteria range so very large changes as well as any other significant changes due to other factors, may not be adequately corrected for. Projecting current data into the past requires a complete understanding of the base-year and reporting-year conditions/changes. Also, the method is correlated to the total waste but not to individual waste stream components. Thus, using the adjustment method backwards to estimate a 1990 base-year is not acceptable. A jurisdiction may, however, request that the Board allow the 1995 generation data to become the new base-year.* | |
| **E. Problems Related to Special Wastes:** | | | | | |
| E-1 | Restricted waste tonnages for inert solids/C&D, scrap metals, white goods, and/or agricultural wastes were excluded from the Board-approved base-year tonnages since they were undocumented. | Added these amounts back into their base-year. | Unacceptable Method (must meet restricted waste criteria) | The inert materials are required by statute to be excluded from base-year diversion unless the specified criteria are met (refer to PRC 41781.2). *Note: Some waste categories were not clearly defined in the SWGS. If diversion tonnages were removed incorrectly for non-restricted waste types (such as for other appliances quantified in a category with white goods), provide staff with a correction request that identifies the correct information in the SWGS/SRRE.* | 6 |
| E-2 | Special type of waste materials were not accounted for in the base-year generation tons (such as sewage sludge that was disposed at a permitted landfill in the base-year). | Increase the base-year generation tonnages for the missing disposal occurring in the base-year. | Acceptable Method (if criteria are met) | Must provide all calculations and cite sources of data. If making other revisions, such as for missing self-haul wastes, jurisdiction must demonstrate that these amounts are not already accounted for in the other calculations. *Note: In order to revise the base-year and claim future diversion credit of sewage sludge, the facility* | 3 |

| Base-Year Problem Categories/Types | | Base-Year Revision Method | Initial Recommendations | Initial Staff Comments/Criteria | Juris Qty |
|---|---|---|---|---|---|
| | | | | *generating the sludge must be located with a jurisdiction's border and a petition must be submitted to the Board that meets the requirements of PRC 41781.1 & 14 CCR Section 18775.2.* | |
| E-3 | Special type of waste materials were not accounted for in the base-year disposal tons (such as waste from regional diversion facilities or regional medical treatment facilities). | Increase the base-year generation tonnages for the missing disposal occurring in the base-year. | Unacceptable Method | Adjustments for the disposal of residual waste from a regional medical waste treatment facility or a regional diversion facility are authorized by statute (PRC 41782). This law recognized that these facilities came into existence after the base-year and thus allows for a reduction of the reporting-year disposal tonnages. Increasing the base-year for these tonnages would result in double accounting and thus is not acceptable. | 1 |
| E-4 | Military wastes were not accounted for in the base-year disposal tons. | Increase the base-year generation tonnages for the missing disposal occurring in the base-year. | Acceptable Method (if criteria are met) | Must provide all calculations, cite all sources of data and use auditable data records. Provide a complete explanation on how the tonnages were derived. | 1 |
| **F. Problems Related to Self-Haul/Non-Franchised Waste Streams:** | | | | | |
| F-1 | Self-haul waste had two amounts identified in SWGS for base-year disposal. Chose the lower amount (believed to be the most accurate). | Revise the base-year by replacing the original self-haul amount with the higher amount listed in the SWGS. | Acceptable Method (if criteria are met) | Need to demonstrate that the revision meets SWGS criteria. Also, examine other data (if available) and demonstrate how it supports this revision. | 1 |
| F-2a | Self-haul/non-franchised/unlicensed waste (all or some portion of these tonnages) appears to have been omitted from the SWGS. | Quantified the 1995 self-haul tonnage for the missed portion of this waste stream and increased the base-year by this amount. | Potentially Acceptable Method *Note: Staff have concerns but acknowledge that basing the revision on 1995 data may be the only reasonable solution at this time other than establishing a new base-year.* | Need to demonstrate first that these amounts were indeed missed in the original SWGS, and then secondly, need to document the 1995 tons. Also need to demonstrate that facilities had these types of haulers disposing in 1990 (& that is not just a change in condition). Discuss how double-accounting has been avoided. Board staff have many concerns regarding the application of 1995 data to the base-year data. For example, the accuracy of these tonnages are questionable due to the lack of verifiable records. Also, conditions may have changed significantly between the two years reducing the appropriateness of such a comparison. . A comparison of another year's disposal data (such as 1996) might provide further justification for this type of revision. | 8 |

| Base-Year Problem Categories/Types | | Base-Year Revision Method | Initial Recommendations | Initial Staff Comments/Criteria | Juris Qty |
|---|---|---|---|---|---|
| F-2b | *Same as above.* | In addition to increasing the base-year using the above method, an additional x% was added since more diversion programs existed in 1995 than there were in the base-year. | Unacceptable Method | Too subjective. Revision should be based on tons and not on an estimated percentage. Need to provide justification based on actual types of programs that would directly impact that specific self-haul waste stream. *Note: Staff have concerns regarding the cost effectiveness of such a method.* | 6 |
| F-2c | *Same as above.* | Using 1995 tons disposed (from disposal reporting system) & diverted (for funded/operated programs only), the adjustment method was applied backwards. The estimate of the base-year tonnage was found when the projected reporting-year generation was equal to the actual 1995 data. | Unacceptable Method | A revision needs to provide actual, itemized corrections to the base-year data. *Note: The adjustment method adjusts for population & economic changes only within a specific criteria range so very large changes as well as any other significant changes due to other factors, may not be adequately corrected for. Projecting current data into the past requires a complete understanding of the base-year and reporting-year conditions/changes. Also, the method is correlated to the total waste but not to individual waste stream components. Thus, using the adjustment method backwards to estimate a 1990 base-year is not recommended. A jurisdiction may, however, request that the Board allow the 1995 generation data to become the new base-year.* | 1 |
| F-2d | . *Same as above* | The jurisdiction's 1995 data was examined and used to calculate the percentage of the total waste stream that the licensed/ franchised as versus the self-hauled/non-franchised portions represented. The base-year was corrected by applying these 1995 proportions to the jurisdiction's base-year data. | Potentially Acceptable Method *Note: Staff have concerns but acknowledge that basing the revision on 1995 data may be the only reasonable solution at this time other than establishing a new base-year.* | Must demonstrate that these portions of the waste stream were indeed missed in the SWGS. Discuss what conditions have remained the same and what has changed between the two years and demonstrate this correction is justified without having to account for any changes between the two time periods. Board staff have many concerns regarding the application of 1995 data to the base-year data. For example, the accuracy of these tonnages are questionable due to the lack of verifiable records. Also, conditions may have changed significantly between the two years reducing the appropriateness of such a comparison. A comparison of another year's disposal data (such as 1996) might provide further justification for this type of revision. | 13 |

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| Base-Year Problem Categories/Types | | Base-Year Revision Method | Initial Recommendations | Initial Staff Comments/Criteria | Juris Qty |
|---|---|---|---|---|---|
| F-2e | . *Same as above* | Revised the 1995 self-haul tons based on changes in taxable sales to estimate the base-year self-haul tons. Since taxable sales increased by x% between the base-year and 1995, the 1995 self-haul tonnage was decreased by x% before being added into the base-year. | Unacceptable Method | There was no correlation demonstrated between the self-haul waste tonnages and taxable sales. Board staff have many concerns regarding the application of 1995 data to the base-year data. For example, the accuracy of these tonnages are questionable due to the lack of verifiable records, and conditions may have changed significantly between years. | 1 |
| F-3a | Self-hauled/C&D waste was not included in the SWGS disposal tonnages. | Quantified the 1995 tonnage for self-haul and C&D. Applied an adjustment factor, based on the ratio of 1990 building permit $ to the 1995 $ (after adjusting 1995 $ for inflation with CPI ratio), and added the additional tons into the base-year. | Unacceptable Method | There was no correlation demonstrated between the self-haul/C&D waste tonnages and the building permit valuation dollars. There may or may not be a direct correlation between the C&D and the building permit valuations (which warrants further investigation) but it is not clear why all the self-haul waste would be affected. Further, there may have been other changes in conditions that contributed to the decrease in valuations over time that is independent of the waste tonnages (such as rate changes). | 2 |
| F-3b | *Same as above.* | Used C&D generation rates (varies for several types of building permits) developed in a study conducted in Oregon. These factors were applied to the quantity of 1990 building permits actually issued and added resulting tonnage into base-year. They assumed there was no other type of self-haul, other than C&D, in the base-year. | Unacceptable Method | The generation rates from the study may or may not be adequate in quantifying the missing tonnages. C&D quantities vary considerably depending upon the project, and this was a very limited study conducted in a single city of another state, so the error range of this method could be significant. Also, there may be additional types of self-hauled wastes omitted that would not be accounted for in these C&D generation rates, such as small commercial contractors (roofers, landscapers, etc.). | 1 |
| F-4 | Self-hauled/C&D waste was not included in the SWGS generation tonnages. | Took the 1995 tons for the missing waste stream, used the adjustment method backwards to estimate the base-year self-haul tonnage and added this amount into the base-year disposed total. | Unacceptable Method | The unadjusted data may be used as a starting point. Must demonstrate that this portion of the waste stream was indeed missed in the SWGS (be sure to subtract out any initial self-haul tonnages already included). Discuss what disposal system conditions have remained the same and what has changed between the two years and demonstrate this correction is justified without having to account for any other changes (in addition to the population & economic changes) between the two time periods. *Note: The adjustment method adjusts for population &* | 4 |

| Base-Year Problem Categories/Types | | Base-Year Revision Method | Initial Recommendations | Initial Staff Comments/Criteria | Juris Qty |
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| | | | | *economic changes within an nominal range, so very large changes as well as any other significant changes due to other factors, may not be adequately corrected for. Projecting current data into the past requires a complete understanding of the base-year and reporting-year conditions/changes. Thus, using the adjustment method backwards to estimate a 1990 base-year is not acceptable. A jurisdiction may, however, request that the Board allow the 1995 generation data to become the new base-year.* | |
| F-5a | Self-haul waste in SWGS for base-year disposal - all or some portion of these tonnages were omitted. | Examined a number of other jurisdictions believed to have similar populations and franchise agreements to determine an average percentage for the franchised portion of the waste stream & used to revise the base-year. | Unacceptable Method | Regulations allow for comparable data to be used in characterizing the waste stream but not for determining the quantity of waste generated. While regional averages may be useful for certain planning purposes that can rely on rough averages, they are not sufficiently accurate for quantifying the waste generation tonnages for demonstrating achievement of the disposal reduction goal. | ? |
| F5b | *Same as above.* | Based on examination of other jurisdictions in area, they believe the self-haul should be x% of the total disposal. | Unacceptable Method | Regulations allow for comparable data to be used in characterizing the waste stream but not for determining the quantity of waste generated. While regional averages may be useful for certain planning purposes that can rely on rough averages, they are not sufficiently accurate for quantifying the waste generation tonnages for demonstrating achievement of the disposal reduction goal. | 1 |
| F5c | *Same as above.* | Examined various surveys conducted at the local landfill to estimate the total disposal % contributed by the city. Revised the base-year accordingly. | Acceptable Method (if criteria are met) | Must provide all calculations, cite sources of data and provide detailed survey information. | 1 |
| F-6a | Self-haul/unlicensed hauler waste tons disposed were omitted as the SWGS was based only on licensed hauler data. | The base-year generation was recalculated using an average per capita generation rate (either based on local cities considered to be similar to jurisdiction, or the basis was not clarified) | Unacceptable Method | Regulations allow for comparable data to be used in characterizing the waste stream but not for determining the quantity of waste generated. Per capita averages vary dramatically, and while useful for certain planning purposes that can rely on rough averages, they are not sufficiently accurate for quantifying the waste generation tonnages for demonstrating | 3 |

| Base-Year Problem Categories/Types | | Base-Year Revision Method | Initial Recommendations | Initial Staff Comments/Criteria | Juris Qty |
|---|---|---|---|---|---|
| | | | | achievement of the disposal reduction goal. | |
| F-6b | *Same as above.* | A study was conducted in 1995 to determine what percentage of the total waste stream the self-haul, non-licensed portion represents. This percentage was applied to the 1995 total to estimate the 1995 self-haul tons, which was then adjusted for the changes in population & employment (combined average) to estimate the base-year self-haul tonnage to add into the base-year generation. | Potentially Acceptable Method *Note: Staff have concerns but acknowledge that basing the revision on 1995 data may be the only reasonable solution at this time other than establishing a new base-year.* | Must demonstrate that this portion of the waste stream was indeed missed in the SWGS. Discuss what disposal system conditions have remained the same and what has changed between the two years and demonstrate this correction is justified without having to account for any other changes (in addition to the population & employment changes) between the two time periods<br>Board staff have many concerns regarding the application of 1995 data to the base-year data. For example, the accuracy of these tonnages are questionable due to the lack of verifiable records. Also, conditions may have changed significantly between the two years reducing the applicability of such a comparison. A comparison of another year's disposal data (such as 1996) might provide further justification for this type of revision. | 1 |
| F-7 | Self-haul waste going to "other" facilities (e.g., outside of local area) was omitted. | Applied the 1995 % of "other" waste (as compared to the 1995 disposed total) and applied this same rate to the base-year to estimate the additional base-year tons. | Potentially Acceptable Method *Note: Staff have concerns but acknowledge that basing the revision on 1995 data may be the only reasonable solution at this time other than establishing a new base-year.* | Must demonstrate that this portion of the waste stream was indeed missed in the SWGS. Discuss what conditions have remained the same and what has changed between the two years and demonstrate this correction is justified without having to account for any changes between the two time periods.<br>Board staff have many concerns regarding the application of 1995 data to the base-year data. For example, the accuracy of these tonnages are questionable due to the lack of verifiable records. Also, conditions may have changed significantly between the two years reducing the applicability of such a comparison. . A comparison of another year's disposal data (such as 1996) might provide further justification for this type of revision. | 1 |